

**GOLDBERG
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July 3, 2024

VIA ECF

Hon. Julien Xavier Neals
United States District Court
District of New Jersey
MLK Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street, Newark, NJ 07102

**Re: STARDUST RECREATION ASSOCIATION v. USA MANAGEMENT,
LLC et al, Case No. 2:22-cv-04746-JXN-JBC**

Dear Judge Neals:

I write pursuant to Your Honor's individual Rule V.B. on behalf of USA Management, LLC ("USA"), defendant in the above captioned action, to request a one-week extension of time to file a reply in further support of USA's motion to vacate the default judgment against it.

On June 11, 2024, USA filed a motion seeking to vacate the default judgment. ECF 17. On June 12, the Court set the motion for July 15, 2024. On June 30, 2024, Plaintiff Stardust Recreation Association filed their opposition to the motion. ECF 18. Pursuant to Local Civil Rule 7.1(d), USA's reply is due seven days before the motion date, in this case, July 8, 2024. USA requests that the motion date and reply date be extended by one week to July 22, and July 15, respectively. No prior request for an extension of dates related to this motion have been made, and the extension will not affect any other dates.

USA seeks the extension to remedy conflicts related to work-related travel commitments both before and after the Fourth of July holiday. This morning, we requested Plaintiff's consent to the extension, but given that it is the eve before the holiday, we felt it appropriate to seek relief before waiting for a response from counsel.

Thank you in advance for your consideration.

Respectfully submitted,

GOLDBERG SEGALLA LLP

Matthew S. Trokenheim

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So ORDERED on 7/8/2024:


JULIEN XAVIER NEALS
United States District Judge

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